

1 ERIC P. ISRAEL (State Bar No. 132426)  
*eisrael@DanningGill.com*  
2 AARON E. DE LEEST (State Bar No. 216832)  
*adeleest@DanningGill.com*  
3 DANNING, GILL, ISRAEL & KRASNOFF, LLP  
1901 Avenue of the Stars, Suite 450  
4 Los Angeles, California 90067-6006  
Telephone: (310) 277-0077  
5 Facsimile: (310) 277-5735  
  
6 Attorneys for Jeffrey I. Golden,  
Chapter 7 Trustee  
7

8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **SANTA ANA DIVISION**  
11

12 In re  
13 JAMIE LYNN GALLIAN,  
14  
15 Debtor.  
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Case No. 8:21-bk-11710-SC  
Chapter 7

**TRUSTEE'S NOTICE OF OPPOSITION  
AND OPPOSITION TO DEBTOR'S  
NOTICE OF HEARING AND MOTION  
REQUESTING THE TRUSTEE  
ABANDON ESTATE'S INTEREST IN  
DEBTOR'S PRIMARY RESIDENCE,  
SPACE 376 2014 SKYLINE  
MANUFACTURED HOME LBM1981;  
MEMORANDUM OF POINTS AND  
AUTHORITIES AND REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT  
THEREOF**

Date: February 15, 2023  
Time: 11:00 a.m.  
Place: Courtroom 5C -Virtual  
411 W. Fourth Street,  
Santa Ana, California 92701

24 PLEASE TAKE NOTICE that Jeffrey I. Golden, as the Chapter 7 Trustee for the  
25 bankruptcy estate (the "Estate") of Jamie Lynn Gallian (the "Debtor), hereby submits this  
26 opposition to the Debtor's Notice of Hearing and Motion Requesting the Trustee Abandon Estate's  
27 Interest in Debtor's Primary Residence, Space 376 2014 Skyline Manufactured Home LBM1981  
28 (*docket nos. 307, 308, 309 and 312*).

1 PLEASE TAKE FURTHER NOTICE that any reply to this opposition must be in writing,  
2 filed with the Clerk of the Bankruptcy Court and served upon counsel for the Trustee named in the  
3 upper left-hand corner of this notice not less than seven calendar days before the hearing.

4  
5 DATED: February 1, 2023

DANNING, GILL, ISRAEL & KRASNOFF, LLP

6  
7 By: /s/ Aaron E. de Leest

8 AARON E. DE LEEST

9 Attorneys for Jeffrey I. Golden, Chapter 7 Trustee  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

The Debtor's Notice of Hearing and Motion Requesting the Trustee Abandon Estate's Interest in Debtor's Primary Residence, Space 376 2014 Skyline Manufactured Home LBM1981 (*docket nos. 307, 308, 309 and 312*) (collectively, the "Motion"), requests that Jeffrey I. Golden, as the Chapter 7 Trustee (the "Trustee") for the Debtor's bankruptcy estate (the "Estate")

abandon the estates (*sic*) interest in Debtor's primary residency, space 376 2014 Skyline Manufactured home LBM1081 located at 16222 Monterey Lane Dr. Unit 376, Huntington Beach, California 92649 [(the "Property")]. Motion, p. 1.

However, the Motion does not cite any authority or offer any evidence in support of the requested relief and must be denied. In addition, on the merits, the Property is not burdensome or of inconsequential value to the estate. Abandonment is also not appropriate at this time because the order granting the Debtor's claimed homestead exemption in the Property is on appeal and the appeal has not yet been fully resolved. Thus, it would be premature for the Court to rule on abandonment, and outside the Court's jurisdiction to do so, while the appeal is pending. Accordingly, as discussed further below, the Court should deny the Motion at this time.

1. The Motion is Defective on its Face

Fed. R. Bankr. P. 9013 provides that a "motion shall state with particularity the grounds therefore, and shall set forth the relief or order sought." Fed. R. Bankr. P. 9013. Local Bankruptcy Rule 9013-1(c)(3) further requires that a motion must be served and filed with:

(A) Duly authenticated copies of all photographs and documentary evidence that the moving party intends to submit in support of the motion, in addition to the declarations required or permitted by FRBP 9006(d); and

(B) A written statement of all reasons in support thereof, together with a memorandum of the points and authorities upon which the moving party will rely.

LBR 9013-1(c)(3).

Here, in violation of Fed. Bankr. R. 9013 and Local Bankruptcy Rule 9013-1(c)(3), the Debtor filed the Motion without any evidence or memorandum of points and authorities. All that is

1 provided is a plain notice and a copy of the Court's Order Granting the Debtor's Motion for  
2 Reconsideration of the Court's August 5, 2022 Order Sustaining Objection to Debtor's Homestead  
3 Exemption (*docket no. 274*) (the "Homestead Order"), attached to the notice. There is simply no  
4 evidence or any written statement setting forth with particularity why the Court should compel the  
5 requested abandonment of the Property. Without evidence or a memorandum of points and  
6 authorities the Motion is defective on its face and the relief requested must be denied.

7 The Debtor also does not appear to have paid the required fee associated with filing a  
8 motion to compel abandonment. See <https://www.cacb.uscourts.gov/filing-fees> and 28 U.S.C. §  
9 1930. The Court should not condone the Debtor's failure to pay the required fee.

10  
11 2. The Motion Should Also Be Denied on the Merits

12 To the extent that the Court looks past the Debtor's procedural failures with the Motion, the  
13 Court should deny the Motion on the merits. As a preliminary matter, it is the Debtor's burden to  
14 compel abandonment under 11 U.S.C. § 554(b). *In re Gill*, 574 B.R. 709, 714 (B.A.P. 9th Cir.  
15 2017) ("The moving party has the burden of establishing that the property at issue is burdensome or  
16 of inconsequential value and benefit to the estate"). Section 554(b) only permits a court to order a  
17 trustee to abandon property of the estate where the property is "burdensome to the estate or that is  
18 of inconsequential value and benefit to the estate." 11 U.S.C. § 554(b). An order to compel  
19 abandonment is "the exception, not the rule" and it is the burden of the party seeking to compel  
20 abandonment (i.e., the Debtor) to prove that the asset has no value. *Id.* The Debtor, without any  
21 evidence, cannot meet her burden. The Debtor has not offered any evidence relevant to whether  
22 the Property is burdensome or of inconsequential value to the estate, including the value of the  
23 Property or the lack of equity in the Property for the Trustee to administer. All that she offers is the  
24 Homestead Order, which the Debtor fails to mention is on appeal and not fully resolved.  
25 Therefore, because the Debtor cannot meet her burden and has failed to do so, the relief requested  
26 in the Motion must be denied.

27 Although the Debtor has not met her burden, the evidence available to the Trustee  
28 demonstrates that there may indeed be value in the Property for the estate, and that abandonment is

1 not appropriate at this time. In particular, the Trustee obtained an opinion that the Property is  
2 valued at or near \$300,000. *See* Declaration of Greg Bingham, ¶ 2, filed in support of the Trustee’s  
3 Application to Employ Coldwell Banker (*docket no. 162*) a copy of which declaration is attached as  
4 Exhibit “1” hereto. In addition, the Court entered the Homestead Order on December 19, 2022, but  
5 on December 29, 2022, creditor Houser Bros. Co., filed a timely notice of appeal (*docket no. 280*),  
6 which appeal is now pending before the District Court as Case No. 8:23-cv-00001-DSF (the  
7 “Homestead Appeal”). As such, the Debtor’s claim of exemption in the Property has not yet been  
8 fully resolved and, if the Homestead Order were reversed on appeal, the Debtor’s claimed  
9 homestead exemption will be disallowed and the equity in the Property will be available for the  
10 estate and its creditors.

11 Furthermore, the California Department of Housing and Community Development (where  
12 liens on manufactured homes are to be recorded, *see* Cal. Health & Safety Code § 18100.5 *et seq.*)  
13 only lists the lien of J-Pad LLC on the Property.<sup>1</sup> Copies of the title transaction documents for the  
14 Property are attached, collectively, as Exhibit “2” hereto. The Debtor has previously admitted in  
15 the bankruptcy case and a related adversary proceeding that the Debtor is (and has been) the sole  
16 member of J-Pad LLC, since October 18, 2018,<sup>2</sup> and that J-Pad LLC’s lien is for \$175,000.<sup>3</sup> The  
17 Trustee disputes that J-Pad LLC’s lien of \$175,000 is valid and, if necessary, will challenge the  
18 purported lien if the Homestead Order is reversed on appeal. However, even if the lien were valid,  
19 the estate owns the Debtor’s sole membership interest in J-Pad LLC, and there still may be equity  
20

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21  
22 <sup>1</sup> To the extent there are other lienholders that assert liens on the Property that are not of record  
23 with the California Department of Housing and Community Development, the Trustee does not  
24 believe that such liens have attached to the Property. *See* Cal. Code Civ. P. § 697.310 (providing  
25 that a judgement lien is created on real property by recording an abstract of a money judgment with  
the county recorder) and Cal. Code Civ. P. § 697.530(d) (providing that a judgment lien on  
personal property does not attach to a mobilehome or commercial coach required to be registered  
pursuant to the Cal. Health & Safety Code).

26 <sup>2</sup> *See* Declaration of Jamie Lynn Gallian, filed on March 16, 2022, in adv. no. 8:21-ap-01096 -  
Jasso v. Gallian et al , adv. docket no. 29, attached as Exhibit “3” hereto.

27 <sup>3</sup> *See* Motion to Avoid Lien Under 11 U.S.C. Section 522(f) and Declaration of Jamie Lynn  
28 Gallian, filed on January 13, 2022, docket no. 297, and attached Gallian Declaration at ¶ 10.

1 in the Property even if the homestead is valid, since the lien trumps a claim of exemption.<sup>4</sup>

2 In light of the above facts, there is no justification for the request to compel the Trustee to  
3 abandon the Property.

4  
5 3. The Court Lacks Jurisdiction to Rule on Abandonment at this Time

6 The Debtor's Motion and the requested relief to abandon the Property are directly related to  
7 the Homestead Appeal. As a result, the Court lacks jurisdiction to grant the Debtor's requested  
8 relief to abandon the Property pending the disposition of the Homestead Appeal. The filing of a  
9 notice of appeal is an event of jurisdictional significance -- it confers jurisdiction on the court of  
10 appeals and divests the trial court of its control over those aspects of the case involved in the  
11 appeal. *Griggs v. Provident Consumer Disc. Co.*, 459 U.S. 56, 58, 103 S. Ct. 400, 402 (1982)  
12 (abrogated on other grounds). When an appeal is pending, the Court may only implement or  
13 enforce its order while on appeal, but it may not alter or expand upon the order. *Sherman v. SEC*  
14 (*In re Sherman*), 491 F.3d 948, 967 (9th Cir. 2007) (citing *Neary v. Padilla (In re Padilla)*, 222  
15 F.3d 1184, 1190 (9th Cir. 2000) (abrogated on other grounds)). Thus, this Court only retains  
16 jurisdiction over matters unrelated to the appeal. *See In re Ahmed*, 420 B.R. 518, 523 (Bankr. C.D.  
17 Cal. 2009) (emphasis added). Here, however, the Debtor's requested abandonment is tied directly  
18 to the Court's ruling with respect to the Homestead Order. In fact, the Homestead Order is  
19 attached to the Motion and it is the sole cited basis upon which the Debtor has requested  
20 abandonment of the Property. Accordingly, because the requested abandonment is directly related  
21 to the Homestead Order, which is currently on appeal to the District Court, this Court lacks  
22 jurisdiction to adjudicate the Motion.

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26 \_\_\_\_\_  
27 <sup>4</sup> J-Pad LLC, was terminated with the California Secretary of State on November 22, 2021. A  
28 copy of the termination is attached as Exhibit "4" hereto.

1           4.     Conclusion

2           The Debtor's Motion should be denied because the Debtor has not met her burden to  
3 establish that the Property is burdensome or of inconsequential value to the estate. Indeed, she  
4 offers no analysis of the equity in the Property and the Property may indeed have equity for the  
5 estate. Furthermore, abandonment is also not appropriate at this time because the Homestead  
6 Order, which is the sole basis for the requested relief, is on appeal and the appeal has not yet been  
7 fully resolved. Therefore, the Court should deny the relief requested in the Motion its entirety.  
8 The Trustee prays for all other appropriate relief under the circumstances.

9  
10 DATED: February 1, 2023

DANNING, GILL, ISRAEL & KRASNOFF, LLP

11  
12 By:           /s/ Aaron E. de Leest          

13 AARON E. DE LEEST

14 Attorneys for Jeffrey I. Golden, Chapter 7 Trustee  
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**REQUEST FOR JUDICIAL NOTICE**

Jeffrey I. Golden, as Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of Jamie Lynn Gallian (the “Debtor), requests that the Court take judicial notice of the following facts.

1. On or about July 28, 2022, the Trustee filed his Application of the Chapter 7 Trustee to Employ Real Estate Broker Coldwell Banker Realty and Agents William Friedman and Greg Bingham Pursuant to 11 U.S.C. 327 and 328; Memorandum of Points and Authorities; and Declarations of William Friedman and Greg Bingham in Support (*docket no. 162*). A true and correct copy Greg Bingham’s declaration is attached as Exhibit “1” hereto and incorporated herein by this reference.

2. On or about August 5, 2022, the Court entered its Order Granting Houser Bros. Co. dba Rancho Del Rey Mobile Home Estate's Motion Objecting to Debtor's Claimed Homestead Exemption in , docket No. 95 (*docket no. 177*), disallowing any claim of exemption by the Debtor in such property.

3. On December 19, 2022, the Court entered its Order Granting the Debtor’s Motion for Reconsideration of the Court’s August 5, 2022 Order Sustaining Objection to Debtor’s Homestead Exemption (*docket no. 274*).

4. On December 29, 2022, creditor Houser Bros. Co., filed a timely notice of appeal (*docket no. 280*), which appeal is now pending before the District Court as Case No. 8:23-cv-00001-DSF.

5. The California Department of Housing and Community Development only lists the lien of J-Pad LLC on the Property. True and correct copies of the title transaction documents for the Property are attached as Exhibit “2” hereto.

6. The Debtor admitted in the Declaration of Jamie Lynn Gallian, adv. no. 8:21-ap-01096 - Jasso v. Gallian et al., *adv. docket no. 29*, filed on March 16, 2022, that the Debtor has been the sole member of J-Pad LLC, since October 18, 2018. A true and correct copy of the Debtor’s Declaration is attached as Exhibit “3” hereto.

7. The Debtor admitted in her Motion to Avoid Lien Under 11 U.S.C. Section 522(f) and Declaration of Jamie Lynn Gallian at ¶ 10, filed on January 13, 2022, *docket no. 297*, that J-



1 Pad LLC's lien is for \$175,000.

2 8. J-Pad LLC, was terminated with the California Secretary of State on November 22,  
3 2021. A true and correct copy of the termination is attached as Exhibit "4" hereto.

4  
5 DATED: February 1, 2023

DANNING, GILL, ISRAEL & KRASNOFF, LLP

6  
7 By: /s/ Aaron E. de Leest

8 AARON E. DE LEEST

9 Attorneys for Jeffrey I. Golden, Chapter 7 Trustee  
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EXHIBIT 1

**DECLARATION OF GREG BINGHAM**

I, Greg Bingham, declare:

1. I am a real estate agent licensed in the State of California. I know each of the following facts to be true of my own personal knowledge or information and belief and, if called as a witness, I could and would competently testify with respect thereto. I am an agent of Coldwell Banker, located at 840 Newport Center Drive, Suite 100, Newport Beach, California 92660. I am submitting this Declaration in support of the *Application of the Chapter 7 Trustee to Employ Real Estate Broker Coldwell Banker Realty and Agents William Friedman and Greg Bingham Pursuant to 11 U.S.C. §§ 327 and 328* ("Application"). Any capitalized terms not expressly defined herein shall have the meanings provided in the Application.

2. I have advised the Trustee that the current market value of the Property is at or near \$300,000.

3. The Broker and I are qualified to represent the Trustee and the Estate in connection with the marketing and sale of the Property. A true and correct copy of the Listing Agreement is attached as **Exhibit 1**. A true and correct copy of my profile is attached as **Exhibit 2**.

4. On behalf of the Broker, I have agreed to accept employment on the terms and conditions set forth in the Application.

5. The Broker and I are employed by the Trustee in other unrelated matters. In addition, Danning, Gill, Israel & Krasnoff, LLP, the Trustee's general counsel, and attorney-trustees at that firm, have worked with the Broker and me in other cases not involving the Debtor.

6. To the best of my knowledge, except as provided above, the Broker and I:

a. have no connection with the Debtor, the Debtor's principals, insiders, creditors, the Trustee, any other party or parties in interest, their respective

1 attorneys and accountants, or any person employed in the Office of the United  
2 States Trustee;

3 b. are not creditors, equity security holders or insiders of the Debtor;

4 c. are not and were not, within two (2) years before the date of the filing  
5 of the petition herein, directors, officers or employees of the Debtor;

6 d. do not represent an individual or entity which holds an interest  
7 adverse to the Estate;

8 e. are not related to the United States Trustee or to the Bankruptcy  
9 Judge assigned to this case;

10 f. are disinterested within the meaning of 11 U.S.C. §§ 327(a) 101(14);

11 g. have no fee sharing arrangement, understanding or compensation  
12 sharing arrangement with any other entity, except for the customary division of the  
13 commission from the sale of a property between the listing broker and the selling  
14 broker, as provided for in the Listing Agreement; and

15 h. will not receive a retainer in this case.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on this 28 day of July, 2022, at Newport Beach, California.

18  
19 DocuSigned by:

*Greg Bingham*

159D7DC418784FB...

Greg Bingham

EXHIBIT 2



DTN: 12339739

Decal: LBM1081

Unit ID: 252606085

Trans Type: L/O Addition

Trans Date: 08/10/2021

Trade Name: CUSTOM VILLA

Serial #: AC7V710394GA, AC7V710394GB

Insignia # PFS1130281, PFS1130282

Status Date: 08/11/2021 User Name: CRUZ, SYLVIA



## CERTIFICATE OF TITLE

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model		DOM	DFS	RY
90002 SKYLINE HOMES INC	CUSTOM VILLA			05/29/2014	07/28/2014	
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Aug 03, 2021	
AC7V710394GÁ	PFS1130282	25,068	60'	15' 2"		

**Addressee**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Registered Owner(s)**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

12339939



Multi-Family - Page 17 of 31

**SECTION A - SMOKE DETECTOR AND WATER HEATER SEISMIC BRACING CERTIFICATION**

California Health and Safety Code (HSC) Sections 18029.6 and 18031.7 require that on the date of transfer of title all used manufactured homes, used mobilehomes, and used multifamily manufactured homes: 1) be equipped with an operable smoke detector in each room designed for sleeping, and 2) all fuel-gas-burning water heater appliances be seismically braced, anchored, or strapped pursuant to existing codes. A declaration may be signed within 45 days prior to the date of transfer of title stating that these requirements have been met.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the unit in California or from issuance of a California Certificate of Title covering the same. I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on \_\_\_\_\_ at \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_

Signature

Printed Name

**SECTION B - RELEASING SIGNATURES**

1a. \_\_\_\_\_ Date of Release \_\_\_\_\_  
Releasing Signature of Registered Owner

1b. \_\_\_\_\_ Date of Release \_\_\_\_\_  
Releasing Signature of Registered Owner

2. \_\_\_\_\_ ☐ Release ☐ Retain \* ☐ Assign Interest  
Legal Owner of Record (if any) sign and check appropriate box (\* If Assign Interest is checked - Complete New Legal Owner Below)

**SECTION C - NEW OWNER INFORMATION****NEW REGISTERED OWNER - Please Print or Type Clearly**

3a. \_\_\_\_\_ New Registered Owners Name  
3c. \_\_\_\_\_ New Registered Owners Name

3b. \_\_\_\_\_ New Registered Owners Name  
3d. \_\_\_\_\_ New Registered Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box.

☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)  
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship  
(\* If this box is checked-Complete HCD 476.6B)

4. \_\_\_\_\_ Mailing Address of New Registered Owner  
City/State \_\_\_\_\_ Zip Code \_\_\_\_\_

5. \_\_\_\_\_ Actual Location Address of Unit  
City/State \_\_\_\_\_ Zip Code \_\_\_\_\_

6. \_\_\_\_\_ Purchase Price or check box if Gift-☐ Purchase Date or Transfer Date \_\_\_\_\_

7a. \_\_\_\_\_ Signature of New Registered Owners  
7c. \_\_\_\_\_ Signature of New Registered Owners

7b. \_\_\_\_\_ Signature of New Registered Owners  
7d. \_\_\_\_\_ Signature of New Registered Owners

**NEW LEGAL OWNER - Please Print or Type Clearly**

8a. \_\_\_\_\_ New Legal Owners Name  
8b. \_\_\_\_\_ New Legal Owners Name

If more than one New Lender going onto title, please check the appropriate Co-owner term box below.

☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)  
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship  
(\* If this box is checked-Complete HCD 476.6B)

9. \_\_\_\_\_ Mailing Address of New Legal Owner  
City/State \_\_\_\_\_ Zip Code \_\_\_\_\_

**NEW JUNIOR LIENHOLDER - Please Print or Type Clearly**

10a. \_\_\_\_\_ New Junior Lienholder Name  
10b. \_\_\_\_\_ New Junior Lienholder Name

11. \_\_\_\_\_ Mailing Address of New Junior Lienholder  
City/State \_\_\_\_\_ Zip Code \_\_\_\_\_

**SECTION D - RELEASE OF DEALERS**

12. \_\_\_\_\_ Signature of Selling Dealer  
Print Dealers Name and Dealer Number \_\_\_\_\_

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model	DOM	DFS	RY	Exp. Date
90002 SKYLINE HOMES INC	CUSTOM VILLA		05/29/2014	07/28/2014		
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Aug 03, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

**Addressee**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649



**Registered Owner(s)**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

\*\*\*\*\*

**ATTENTION OWNER:**

THIS IS THE REGISTRATION CARD FOR THE  
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS  
CARD IN A SAFE PLACE WITHIN THE UNIT.

**INSTRUCTIONS FOR RENEWAL:**

REGISTRATION FOR THIS UNIT EXPIRES ON THE  
DATE INDICATED ABOVE IN THE BOX LABELED  
"Exp. Date". THERE ARE SUBSTANTIAL  
PENALTIES FOR DELINQUENCY. IF YOU DO NOT  
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS  
PRIOR TO THE EXPIRATION DATE, CONTACT  
H.C.D. FOR RENEWAL INSTRUCTIONS.

\*\*\*\*\*

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12313525

08032021 - 1



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



**STATEMENT OF FACTS**

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):	Trade Name:	Serial No.(s):
LBM1081	CUSTOM VILLA	AC7V710394GB/GA

I/We, the undersigned, hereby state:

Jamie L. Gallian, say that J-Pad, LLC is the Legal Owner and perfected their lien 1/14/2019. \*

The correct Address for the Legal Owner - J-Pad LLC  
21742 Anza Ave, Torrance, CA 90503

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 8/6/2021 at Huntington Beach, CA  
Date City State

Signature(s): 	Printed name(s): Jamie Lynn Gallian
-------------------	--

Address 16222 Monterey Ln #376  
City Huntington Beach State CA 92649



STATE OF CALIFORNIA  
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



**STATEMENT TO ENCUMBER**

**SECTION I. DESCRIPTION OF UNIT**

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM1081

The Trade Name is: SKYLINE HOMES-CUSTOM VILLA

The Serial Number(s) is: AC7V710394GB; AC7V710394GA

**SECTION II. LEGAL OWNER INFORMATION**

I/We are releasing legal owner interest in the above-described unit to encumber the title (record a lien) in favor of:

J-PAD, LLC - SOS ENTITY NO. 201804010750

(Name of New Legal Owner)

Address: 2702 N. GAFF STREET ORANGE, CA 92865  
Street Address or P.O. Box City State Zip

**SECTION III. CERTIFICATION**

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 1/14/2019 at HUNTINGTON BEACH, CALIFORNIA, CO. OF ORANGE  
Date City State

Signature of each registered owner:

*James R. Miller, its Member*

Printed name of each registered owner:

J-SANDCASTLE CO LLC

Address: 16222 MONTEREY LN 376 HUNTINGTON BEACH, CA 92649  
Street Address or P.O. Box City State Zip



EXHIBIT 3



JAMIE LYNN GALLIAN  
16222 MONTEREY LN. #376  
HUNTINGTON BEACH, CA 92649  
(714) 321-3449  
[JAMIEGALLIAN@GMAIL.COM](mailto:JAMIEGALLIAN@GMAIL.COM)

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA

In re: JAMIE LYNN GALLIAN

CASE NO, 8:21-bk-11710-ES

ADV CASE NO. 8:21-ap-01096

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JANINE JASSO, ESQ.  
PLAINTIFF

DECLARATION JAMIE LYNN GALLIAN

VS

JAMIE LYNN GALLIAN  
J-PAD, LLC  
J-SANDCASTLE, CO. LLC

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I, Jamie Lynn Gallian, declare under penalty of perjury under the Laws of the State of California the foregoing statement to be true and correct.

On October 18, 2018, Articles of Incorporation were amended to reflect I was the sole member of J-Pad, LLC. There are no other Members of J-Pad, LLC. There were two managers with authority to act in my absence only, namely Robert McLelland and/or Ronald Pierpont.

On October 18, 2018, the Articles of Incorporation were filed reflecting I was the sole Member of J-Sandcastle Co. LLC. There are no other Members of J-Sandcastle Co. LLC. There were two managers with authority to act in my absence only, namely Robert McLelland and/or Ronald Pierpont.

In re: JAMIE LYNN GALLIAN

CASE NO, 8:21-bk-11710-ES


ADV CASE NO. 8:21-ap-01096

On November 22, 2021, I filed with the California Secretary of State CERTIFICATE OF CANCELLATION for both entities, J-Pad, LLC and J-Sandcastle Co. LLC, respectively.

Due to the Members financial circumstances caused by a physical injury event to the Member, and the afflictions of the Global Pandemic, the single member entities could not conceptually operate as anticipated. The original purpose of the entity's to acquire and manage company assets. The company never got off the ground as planned.

The sole Member of J-Pad, LLC and J-Sandcastle Co. LLC made the decision to file the Certificate of Cancellation on November 22, 2021, before the end of the year to remain in Good Standing with the California Secretary of State.

DATE: March 15, 2022

  
JAMIE LYNN GALLIAN, MEMBER J-PAD LLC

  
JAMIE LYNN GALLIAN, MEMBER, J-SANDCASTLE CO., LLC

EXHIBIT 4



## California Secretary of State Electronic Filing

**FILED**

Secretary of State  
State of California

### LLC Termination – Certificate of Cancellation

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Entity Name: J-PAD, LLC.

Entity (File) Number: 201804010750

File Date: 11/22/2021

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#### Detailed Filing Information

##### **Dissolution**

The Dissolution was made by a vote of ALL of the members of the California Limited Liability Company.

##### **Tax Liability Statement**

All final returns required pursuant to the California Revenue and Taxation Code have been or will be filed with the California Franchise Tax Board.

##### **Cancellation Statement**

Upon the effective date of this Certificate of Cancellation, the Limited Liability Company's registration is cancelled and its powers, rights and privileges will cease in California.

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

##### **Electronic Signature(s):**

Jamie Gallian

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): TRUSTEE'S NOTICE OF OPPOSITION AND OPPOSITION TO DEBTOR'S NOTICE OF HEARING AND MOTION REQUESTING THE TRUSTEE ABANDON ESTATE'S INTEREST IN DEBTOR'S PRIMARY RESIDENCE, SPACE 376 2014 SKYLINE MANUFACTURED HOME LBM1981; MEMORANDUM OF POINTS AND AUTHORITIES AND REQUEST FOR JUDICIAL NOTICE IN SUPPORT THEREOF will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) February 1, 2023 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

**2. SERVED BY UNITED STATES MAIL:** On February 1, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by causing to be placed a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 1, 2023  
\_\_\_\_\_  
*Date*

Beverly Lew  
\_\_\_\_\_  
*Printed Name*

/s/ Beverly Lew  
\_\_\_\_\_  
*Signature*

ADDITIONAL SERVICE INFORMATION (if needed):

**1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)**

Bradford Barnhardt on behalf of Interested Party Courtesy NEF  
bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, kfrederick@ecf.courtdrive.com

Bradford Barnhardt on behalf of Plaintiff Houser Bros. Co.  
bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, kfrederick@ecf.courtdrive.com

Aaron E. DE Leest on behalf of Trustee Jeffrey I Golden (TR)  
adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com

Robert P Goe on behalf of Creditor The Huntington Beach Gables Homeowners Association  
kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com

Robert P Goe on behalf of Plaintiff The Huntington Beach Gables Homeowners Association  
kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com

Jeffrey I Golden (TR)  
lwerner@go2.law, jig@trustesolutions.net; kadele@go2.law

D Edward Hays on behalf of Creditor Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates  
ehays@marshackhays.com,  
ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com

D Edward Hays on behalf of Interested Party Courtesy NEF  
ehays@marshackhays.com,  
ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com

D Edward Hays on behalf of Plaintiff Houser Bros. Co.  
ehays@marshackhays.com,  
ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com

Brandon J Iskander on behalf of Creditor The Huntington Beach Gables Homeowners Association  
biskander@goeforlaw.com, kmurphy@goeforlaw.com

Brandon J Iskander on behalf of Plaintiff The Huntington Beach Gables Homeowners Association  
biskander@goeforlaw.com, kmurphy@goeforlaw.com

Eric P Israel on behalf of Trustee Jeffrey I Golden (TR)  
eisrael@DanningGill.com, danninggill@gmail.com; eisrael@ecf.inforuptcy.com

Laila Masud on behalf of Creditor Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates  
lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

Laila Masud on behalf of Interested Party Courtesy NEF  
lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

Laila Masud on behalf of Plaintiff Houser Bros. Co.

lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

Mark A Mellor on behalf of Defendant Randall L Nickel

mail@mellorlawfirm.com, mellormr79158@notify.bestcase.com

Mark A Mellor on behalf of Interested Party Courtesy NEF

mail@mellorlawfirm.com, mellormr79158@notify.bestcase.com

Valerie Smith on behalf of Interested Party Courtesy NEF

claims@recoverycorp.com

United States Trustee (SA)

ustpregion16.sa.ecf@usdoj.gov

## **2. SERVED BY U.S. MAIL**

Debtor

Jamie Lynn Gallian

16222 Monterey Ln Unit 376

Huntington Beach, CA 92649

The Honorable Scott C. Clarkson

U.S. Bankruptcy Court

411 W. Fourth Street, Suite 5130

Santa Ana, CA 92701